



SIDLEY AUSTIN LLP  
ONE SOUTH DEARBORN STREET  
CHICAGO, IL 60603  
(312) 853 7000  
(312) 853 7036 FAX

smcinerney@sidley.com  
(312) 853 3766

BEIJING	HONG KONG	SHANGHAI
BOSTON	HOUSTON	SINGAPORE
BRUSSELS	LONDON	SYDNEY
CHICAGO	LOS ANGELES	TOKYO
DALLAS	NEW YORK	WASHINGTON, D.C.
FRANKFURT	PALO ALTO	
GENEVA	SAN FRANCISCO	

FOUNDED 1866

September 10, 2018

**VIA ECF**

Hon. Vernon S. Broderick  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 415  
New York, NY 10007

Re: Great Western Ins. Co. v. Mark Graham et al., Case No. 18-06249 (VSB)

Dear Judge Broderick:

We represent Plaintiff Great Western Insurance Company ("Great Western") in the above-captioned matter. We write to update you on our efforts to serve certain foreign defendants in this case. Although the 90-day time limit for service set forth in Fed. R. Civ. P. 4(m) "does not apply to service in a foreign country," we wanted to provide the Court with an update on service, given the number of defendants, both foreign and domestic, in this case.

On August 16, 2018, pursuant to Fed. R. Civ. P. 4(f), we filed a request under the *1965 Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters* with the Central Authorities of the Cayman Islands, Bahamas, and Bermuda for service of process, in accordance with local rules for service, on defendants Alpha Re Holdings Limited, Atlantic Specialty Finance, Edward Brendan Lynch, and Gregory Tolaram.

On August 27, 2018, defendant Edward Brendan Lynch was properly served under local rules, in-person, in the Bahamas. *See* Dkt. No. 43.

At this time, the Central Authorities are still in the process of serving defendants Alpha Re Holdings Limited, Atlantic Specialty Finance, and Gregory Tolaram. Once service is properly effectuated on each of these defendants, we will file proof of service as to each such defendant.

Respectfully submitted,

A handwritten signature in black ink that reads "Stephen W. McInerney".

Stephen W. McInerney  
(admitted *pro hac vice*)

cc: Counsel of Record (via ECF)